

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**UNITED STATES OF AMERICA** )  
 )  
**v.** ) **Case No. 3:19cr130**  
 )  
**OKELLO T. CHATRIE,** )  
 **Defendant** )

**DEFENDANT’S REPLY TO GOVERNMENT’S RESPONSE TO**  
**MR. CHATRIE’S MOTION FOR ISSUANCE OF**  
**A SECOND SUBPOENA DUCES TECUM PURSUANT TO RULE 17©**

Okello Chatrie, through counsel, notifies the Court that he has no objection to the government's request to add information sought in the second subpoena *duces tecum* to Google as set forth in red in ECF No. 129-01. Thus, pursuant to Mr. Chatrie's constitutional rights to remain free from unreasonable searches and seizures, to due process, to obtain evidence through compulsory process, and to effective assistance of counsel, Mr. Chatrie requests that the Court issue forthwith the subpoena sought in his motion for a second *duces tecum* for Google as set forth in ECF No. 123. The body of the subpoena—the substance of what must be produced—should consist of the complete and joint requests from the parties as set forth in the proposed “Exhibit A” in ECF No. 129-01. Mr. Chatrie further requests that the Court require Google to produce the requested information, which the company has already been able to see through the parties' public filings, within one week of the issuance of the subpoena.

Respectfully submitted,  
OKELLO T. CHATRIE

By: /s/  
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